

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
100 EAST FIFTH STREET, SUITE 103  
CINCINNATI, OH 45202

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

20 JUN 29 PM 1:34

U.S. DISTRICT COURT  
SOUTHERN DIST OHIO  
WEST DIV CINCINNATI

DATE FILED: **1:20 CV 500**

**WILLIAM C. SHEHAN, JR., et al.,**  
903 Riva Ridge Court  
Union, KY 41091

Plaintiff,

vs.

**UNITED STATES DEPARTMENT OF JUSTICE**  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530

**DAVID BUNNING, AGENT of TRUIST FINANCIAL**  
Honorable Federal Judge  
35 West Fifth Street  
Covington, KY 41011

**STOCK YARD BANK**  
Mr. James Hillebrand  
1040 East Main Street  
Louisville, KY 40206

**PAYPAL**  
Mr. Daniel Schulman  
2211 North First Street  
San Jose, CA 95131

**PNC BANK**  
Mr. Gregory Jordan  
1 PNC Plaza, 249 Fifth Avenue  
Pittsburgh, PA

) Paycheck Protection Program

) CASE NO.:

**J. DLOTT**

**M.J. BOWMAN**

) Racketeering  
) Conspiracy / Graft  
) Witness Tampering  
) Obstruction of Justice  
) Aiding & Abetting

**WILLIAM O. BERTELSMAN**

Honorable Federal Judge

35 West Fifth Street

Covington, KY 41011

**SUSAN DLOTT**

Honorable Federal Judge

100 East Fifth Street, Suite 103

Cincinnati, OH 45202

**SUSAN PALMISANO, Agent of Truist Financial**

Internal Revenue Service

550 Main Street

Cincinnati, OH 45202

**LOUIS DE FALAISE, Agent of Truist Financial**

United States Department of Justice

950 Pennsylvania Avenue, NW

Washington, D.C. 20530

**KIMBERLY HEIDEL, SENIOR OFFICER**

35 West Fifth Street

Covington, KY 41011

**BOB MCBRIDE, U.S. ATTORNEY**

950 Pennsylvania Avenue, NW

Washington, D.C. 20530

**FEDERAL OFFICIALS, 1 THROUGH 5**

35 West Fifth Street

Covington, KY 41011

et al.,

Defendants,

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## FEDERAL CIVIL COMPLAINT

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The undersigned has served a copy of this NOTICE, by mailing via the U.S. Postal Service or e-mailing a copy on this 29<sup>th</sup> day of June 2020, to the following recipients:

**UNITED STATES DEPARTMENT OF JUSTICE**

U.S. Attorney's Office  
221 E. Fourth Street, Suite 400  
Cincinnati, OH 45202

**TRUIST FINANCIAL CORPORATION, BB&T BANK**

Kelly S. King, Andrew Hawking, Bob Zapp, Jr.  
100 East 4<sup>th</sup> Street  
Cincinnati, OH 45202

**STOCK YARD BANK – MR. JAMES HILLEBRAND**

1040 East Main Street  
Louisville, KY 40206

**PAYPAL – MR. DANIEL SHULMAN**

2211 North First Street  
San Jose, CA 95131

**PNC BANK – MR. GREGORY B. JORDAN**

1 PNC Plaza, 249 Fifth Avenue  
Pittsburgh, PA

**HONORABLE DAVID L. BUNNING**

**AGENT OF TRUITT FINANCIAL**

U.S. District Court, Eastern District of Kentucky  
35 West Fifth Street  
Covington, KY 41011

**RICHARD KNOCK – AGENT OF TRUIST FINANCIAL**

**Knock Family Foundation**

10730 Omaha Trace  
Union, KY 41091

**HONORABLE WILLIAM O. BERTLESMAN**

U.S. District Court, Eastern District of Kentucky  
35 West Fifth Street  
Covington, KY 41011

**HONORABLE SUSAN J. DLOTT & STANLEY CHESLEY**

U.S. District Court, Southern District of Ohio  
Potter Stewart Courthouse  
100 East 5<sup>th</sup> Street, Suite 103  
Cincinnati, OH 45202

**SENIOR PROBATION OFFICER -KIMBERLY HEIDEL**

U.S. District Court  
35 West Fifth Street  
Covington, KY 41011

**SUSAN PALMISANO – AGENT OF TRUIST FINANCIAL**

U.S. Internal Revenue Service – Internal Affairs  
550 Main Street  
Cincinnati, OH 45202

**SUPREME COURT OF KENTUCKY**

**JOHN D. MINTON, JR., HONORABLE CHIEF JUSTICE**

700 Capital Avenue, Suite 209  
Frankfort, KY 40601

**BOONE COUNTY CIRCUIT COURT**

**HONORABLE JUDGE J.R. SCHRAND**

6025 Rogers Lane  
Burlington, KY 41005

**KENTUCKY ENQUIRER – Mr. EDDIE TYNER**

312 Elm Street  
Cincinnati, OH 45202



WILLIAM C. SHEHAN, JR.  
Pro Se Plaintiff

June 29, 2020

Date

## **VENUE**

The United States District Court for the Southern District of Ohio is the proper venue for this matter since Defendants hold offices or maintain operations within the district. In addition, contracts related to the PPP application are related to projects where man-hours will be expenses within the Southern District.

Moreover, a Complaint of Judicial Criminal Conduct was filed in the United States Court of Appeals for the Sixth Circuit in Cincinnati, OH, on January 31<sup>st</sup>, 2020. In the Judicial Criminal Complaint, factual allegations, evidence, and testimony were provided to the Appeals Court describing Federal Racketeering activity by Truist Financial Corporation, Kelly S. King, Andrew Hawking, Bob Zapp, Jr., Deborah J. Durr, Richard Knock, multiple Federal Judges, Federal Officials, and others.

Shehan has provided his personal testimony and evidence in these matters to the United States Inspector General in the same federal complex which houses the U.S. District Court for the Southern District and U.S. 6<sup>th</sup> Circuit Court of Appeals.

On May 12<sup>th</sup>, 2020, the Court of Appeals contacted Shehan with guidance on multiple topics. Therefore, it is necessary to initiate claims involving the Paycheck Protection Program first, in the United States District Court for the Southern District of Ohio.

## **JURISDICTION**

The United States Federal Courts are the proper jurisdiction for this matter based on the subject matter surrounding the federal Paycheck Protection Program.

The United States Department of Justice maintains offices and representation in all fifty of these United States.

## **PARTIES IN THIS ACTION**

### **BILL SHEHAN, JR.:**

Mr. Shehan is a life-long resident in the State of Kentucky where he resides at 903 Riva Ridge Court, Union, KY in Boone County. Since 1994, Shehan formed and operated many businesses, one of which is, L.T.C. Signature Environments, LLC, doing business as, Larson Theme Construction. Larson specializes in the design and development of innovative attractions and theme environments for major tourist destinations.

### **STOCK YARD BANK:**

Stock Yard Bank is a financial services and banking company with offices in the Southern District of Ohio which participates in the PPP.

### **PNC BANK:**

PNC Bank is a financial services and banking company with offices in the Southern District of Ohio which participates in the PPP.

### **PAYPAL:**

Paypal is a banking and financial services company with operations in the Southern District of Ohio which participates in the PPP.

### **UNITED STATES DEPARTMENT OF JUSTICE:**

The United States Department of Justice is a federal executive department responsible for the enforcement of law and administration of justice in the United States of America. The Department of Justice is part of this action based on damages caused to the Plaintiff through a tax case, which now form the basis as to why multiple banks refuse to approve and submit the Plaintiff's application to the Small Business Administration.

At no time was the tax case implemented or intended to collect taxes. The tax case was conceived, designed and fabricated by Truist Financial as a weapon to control Shehan's testimony, to conceal bank fraud, to engage in federal racketeering and obstruction of justice. **The tax case is a 100% fabricated fraud!**

However, damages and issues connected to the tax case are not the subject of this action.

## **PARTIES NOT PART OF THIS ACTION**

### **TRUIST FINANCIAL CORPORATION, BB&T BANK:**

Truist Financial Corporation operates BB&T Bank, (The Bank or Bank) and consists of many former banks acquired through buyouts, including People's Bank and The Bank of Kentucky, which are now part of BB&T. Truist Financial and BB&T is a banking company with offices in the Southern District of Ohio that participates in the PPP.

Bank President, Kelly S. King, Andrew Hawking, Bob Zapp, Jr., Deborah J. Durr, Louis DeFalaise, Susan Palmisano, Federal Judge, David Bunning, and Richard Knock are officers, shareholders in, or Agents for TRUIST FINANCIAL, owner of BB&T Bank.

According to the witness, Truist Financial Corporation paid a seven-figure, quid pro quo bribe to negotiate, secure and obtain the support of Federal Judges and Officials in the U.S. District Court for the Eastern District of Kentucky for the protection of the Bank's equity value - pending an acquisition.

According to documents, witnesses and legal investigators, Truist Financial Corporation utilized its relationship with I.R.S. Agent, Susan Palmisano, and, Louis De Falaise, a high-ranking Department of Justice official, who served over a long period of time, as the Bank's political hitman to protect the Bank's equity value and profitability.

Kelly S. King, Andrew Hawking and Bob Zapp, Jr., Richard Knock, Deborah J. Durr, and others took action to conceal these events, testimony, evidence and billions of dollars in damages and liabilities from shareholders - by Conspiring to submit false evidence to the Courts, making false statements, engaging in acts of deception, racketeering, illegal influencing of public officials, graft, paying bribes, witness tampering, and more.

However, currently, the tax case, related claims and damages are not part of, or the subject of this action. This action is focused on damages caused by Stock Yard Bank, Paypal and PNC Bank which utilized the events described above as the basis to deny Shehan the benefits made available through the Paycheck Protection Program.



**SMALL BUSINESS ADMINISTRATION:**

The Small Business Administration is a United States government agency that provides support to entrepreneurs and small businesses. The mission of the Small Business Administration is "to maintain and strengthen the nation's economy by enabling the establishment and viability of small businesses and by assisting in the economic recovery of communities after disasters".

In accordance with the leadership of President Trump, the Small Business Administration developed and offered the Paycheck Protection Program (P.P.P.) to all businesses in the United States as necessary to offset the explosive loss of jobs across the nation because of the covid-19 pandemic. The P.P.P. requires that applicants be in business prior to the pandemic and suffered a loss because of the economic downturn caused by the lockdown.

The Small Business Administration was in the business of providing Economic Disaster Loans prior to this pandemic. The PPP is a different and unique program in that funds are designed as a form of insurance benefit to cover losses caused by the pandemic. By adhering to simple guidelines, the funds do not have to be repaid - negating the perspective funds provided through the PPP are a loan.



## **COMPLAINT**

1. Plaintiff, William C. Shehan, Jr, hereafter referred to as “Shehan” brings this action before the Court seeking relief and damages in relation to the Plaintiff’s application to participate in the Small Business Administration’s Paycheck Protection Program (P.P.P.), subsequently denied by the Defendants – causing injury during a devastating, worldwide pandemic.
2. This action is currently limited to claims involving the Paycheck Protection Program.
3. As documented in the PPP application, Shehan’s business, L.T.C. Signature Environments, dba, Larson Theme Construction, is a Kentucky LLC formed in 2015, a successor company to Larson Theme Construction, which was formed in 2004, a successor company to Man Made Wonders which was formed in 1994.
4. In the first quarter of 2020, Shehan entered into three contractual agreements related to projects in the tourism sector.
5. As the pandemic developed and lockdowns and quarantines began to bear down on the U.S. economy, more specifically the tourism and entertainment sector, Shehan’s business was severely and negatively impacted causing financial loss.

6. Learning that President Trump and the Trump Administration was offering the Paycheck Protection Program through the Small Business Administration for the explicit purpose of covering economic losses caused by the impact of the Covid-19 virus, Shehan contacted three banks to submit applications.
7. Stock Yard Bank accepted referrals of other businesspeople brought to Stock Yard by Shehan - business associates Shehan has known for years, who Stock Yard was happy to receive and do business with; and process their PPP applications. However, with full disclosure provided in advance, and after searching Shehan's social security number and related records, Stock Yard Bank declined to process Shehan's PPP application. Stock Yard confirmed their decision was based on information in the public record related to the tax case. More specifically, Stock Yard based their decision on fraudulent information placed into the public record by the United States Department of Justice and Truist Financial Corporation.
8. Shehan then applied for PPP benefits through Paypal. However, Paypal declined to process Shehan's application based on the same information collected through Shehan's social security number. Paypal based their decision on false and fraudulent information placed into the public record by the United States Department of Justice and Truist Financial Corporation.

9. Shehan then applied for PPP insurance benefits through PNC Bank. However, PNC Bank declined to process Shehan's application based on circumstances connected to the tax case and information related to the tax case – damages caused by the United States Department of Justice and Truist Financial Corporation.
  10. Stock Yard Bank, Paypal and PNC Bank hold a high-level of responsibility to consider all information in deciding to decline Shehan's application for benefits. People are suffering through a worldwide pandemic where the financial and social issues are becoming more serious by the day. In this respect, the banks failed to exercise proper collection and evaluation of all information related to Shehan's application. Furthermore, banks are required to "Know Your Customer." If the banks would have exercised care and consideration of all information, Shehan's application would have been approved. However, because of the bank's gross negligence, breach of the PPP, and bad faith, Shehan suffered damages.
  11. The false and fraudulent information placed into the public record by the Department of Justice and Truist Financial Corporation, the files which Stock Yard Bank, Paypal and PNC Bank relied on in reaching a determination to decline's Shehan's PPP application, are provided in the following pages for the Court's evaluation and consideration:
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12. The Bank's president circumvented proper channels and knowingly filed false allegations against Shehan through a suspicious activity report to open an investigation which the Bank conceived as a method to control Shehan's testimony against the Bank's illegal activities. Evidence suggests the SARS report was delivered directly to I.R.S. Special Agent, Susan Palmisano, for a special purpose, since Palmisano proves herself to be an Agent of Truist Financial.
13. According to official I.R.S. documents, Palmisano immediately created a false paper trail and case reports in the I.R.S. data system to conceal the identity of the Bank's president and the role the Bank played in this matter. Palmisano first lied to the I.R.S. about the source of the investigation. Later, Palmisano filed knowingly false documents and evidence in Federal Court as necessary to conceal the identity of Truist Financial Corporation's role and control over the tax case it created. Susan Palmisano was an employee for the I.R.S. - who was later identified and confirmed as an Agent working on behalf of Truist Financial Corporation. Many of these events transpired around the same time I.R.S. Official, Lois Learner, was committing crimes against American Citizens through her post at the I.R.S. in the Cincinnati, OH office.
14. Soon after the I.R.S. investigation was underway, led by Palmisano, the United States Department of Justice threatened to prosecute Shehan if he came forward with his testimony against Kentucky Judge, Joseph J. Bamberger, in Kentucky's Fen Phen case. Evidence obtained later confirms Shehan's testimony would

implicate nationally recognized trial attorney, Stan Chesley, who is the husband of current Federal Judge, Susan J. Dlott. Those involved in the Fen Phen Fraud conceived and implemented a strategy, in coordination with the Bank, to utilize Shehan's tax case to provide immunization to Joseph Bamberger and Stan Chesley. A violation of Shehan's rights, and a clear act of Fraud and Obstruction of Justice.

15. **Shehan is material witness number one in three federal criminal cases** involving the Bank where Shehan's testimony, evidence, and first-hand knowledge of events, implicates Truist Financial Corporation in the largest criminal organization ever to exist in the history of Kentucky.
16. Shehan was prevented from testifying and his evidence suppressed under the threat of prosecution by the U.S. Department of Justice. Shehan's testimony describes the Bank's preconceived scheme to Conspire with the Department of Justice to attack the value of People's Bank of Crestview Hills, Ky, and deliver People's value to BB&T Bank. The Bank's president shared with Shehan in detail how the Bank was "working behind the scenes" to take down homebuilder, William Erpenbeck, for the purpose of collapsing People's Bank. Legal investigators later confirmed the Bank's relationship with the Kentucky Enquirer who was instrumental in causing "a run-on" People's Bank's deposits forcing People's Bank to sell-out to Truist Financial. Once the media circus surrounding People's Bank settled, public records in the Court now confirm losses related to People's Bank at just \$7 million. This amount is contrasted to the \$75 million in losses utilized by

the Kentucky Enquirer and U.S. Department of Justice to cause People's Bank to collapse. Bob Zapp, Jr., stated very clearly in media reports that he (Zapp) informed People's Bank and their board of directors that People's faced a "run-on" deposits at their bank. However, Zapp did not inform People's Bank, and the Kentucky Enquirer did not reveal in their reporting, that BB&T and Truist Financial Corporation was conspiring with the U.S. Department of Justice and Kentucky Enquirer to cause the "run-on" deposits at People's Bank.

17. The second case in which Shehan is material witness number one is Kentucky's Fen Phen fraud - where then Boone County Circuit Court Judge, Joseph J. Bamberger, conceived and structured an illegal "victim's fund." Bamberger proposed that he would serve as the "trustee" of the "victim's fund" before the case was even filed in his courtroom. **Shehan was there on Day-One when Bamberger conceived, structured and proposed the Fen Phen Fraud.** However, Shehan was prevented from providing his testimony and evidence during the federal criminal trial as necessary to shield and protect both Judge Bamberger, and trial attorney, Stan Chesley, from criminal prosecution. Shehan's testimony combined with other testimony already in the Court confirm that Bamberger conspired with and structured the Fen Phen fraud with attorney, Stan Chesley, rather than other attorneys who have now been in prison for ten years.
18. The United States Department of Justice utilized Shehan's tax case to immunize Boone County Circuit Judge, Joseph Bamberger, and attorney, Stan Chesley, by

illegally suppressing Shehan's testimony. **The tax case is a 100% FABRICATED FRAUD conceived and deployed by the Truist Financial Corporation to protect the bank, the bank's network, the bank's profitability, and equity value.** Kelly S. King, Andrew Hawking and Bob Zapp, Jr., Deborah J. Durr, Richard Knock, David Bunning, and others, acted to conceal the illegal relationship with the Department of Justice, Internal Revenue Service, Kentucky Enquirer and others in a long list of crimes and frauds committed to build equity value in Truist Financial.

19. According to recent opinions issued by the U.S. 6<sup>th</sup> Circuit Court of Appeals in Cincinnati, current Federal Judge, Susan J. Dlott, structured a series of entities which were set up to receive money from the Fen Phen fraud. It is unknown at this time, what role Judge Dlott served with the Department of Justice in structuring Shehan's tax case to immunize her husband, Stan Chesley. Regardless, illicit structuring occurred on the front-end of the Fen Phen case, and now, according to the 6<sup>th</sup> Circuit Court of Appeals, there is illegal structuring on the back-end of the Fen Phen fraud - raising questions of racketeering between Federal Agencies, Federal Officials, Federal Judges and the Truist Financial Corporation.
20. Truist Financial Corporation and the United States Department of Justice then initiated a 6-year pre-indictment delay for the purpose of protecting and shielding Bamberger and Chesley during the second criminal prosecution after the first trial ended in acquittal of the other attorneys.



21. Shehan's tax case remained dormant for over 6 years while the Fen Phen prosecutions moved through the U.S. District Court in Covington, KY.
22. However, in August of the same month the second Fen Phen trial came to conclusion, the President of the Bank revisited Shehan's tax case for the third time – the same tax case the Bank conceived and utilized to suppress Shehan's testimony in the People's Bank matter and Fen Phen matter.
23. In this third case, Shehan was leading litigation on behalf of The Florence Baptist Church against the Bank, Bob Zapp, Jr., and Andrew Hawking, and other bankers, where \$20 million in bank fraud against the Church is involved. Officers, Agents and shareholders in Truist Financial worked desperately to conceal the fraud, deception, threats and racketeering involved to protect the Bank.
24. In a scheme to protect the Bank's equity value, the Banker's initiated Shehan's prosecution through the Bank's agent, Louis DeFalaise, inside the U.S. Department of Justice. This was done at the same time the Bank was working to transfer the Church's legal claims to a law firm friendly to the Bank who would bury the Church's claims of Bank Fraud. That law firm is Adams, Stepner, Wolterman & Dusing, the old law firm where Louis DeFalaise was once employed.

25. The Banker's, including Bob Zapp, Jr., Andrew Hawking and others, called a meeting with Richard Knock and provided Knock with a false set of events and details and submitted the false information to the F.B.I. in an effort to deceive the F.B.I. and direct the F.B.I.'s investigation away from the Bank – at a time when the Bank was positioning for a 9-figure acquisition.
26. Soon thereafter, Richard Knock surfaces in secret ex parte meetings and negotiations with Federal Judge, David Bunning, which the Bankers orchestrated to protect the profitability of the Bank and the Bank's equity value where \$364,000,000 was at stake in a pending buyout.
27. In addition, the Banker's organized and orchestrated other meetings and discussions with #1 through #5 Federal Officials and others within the U.S. District Court for the Eastern District of Kentucky. All these meetings and discussion were held ex parte and done in secret to protect and benefit Truist Financial Corporation. Meetings were held inside and outside the Eastern District Court.
28. Federal Judge, David Bunning, provided assurance to the Bank that Shehan would receive a 24-month sentence, as secretly negotiated, and the Bank would be protected. As evidence of their secret agreement, Judge Bunning, after accepting the government's 6-year preindictment delay, denied Shehan's motion for 6 months of additional time, for a total of just twelve months. The Bank's plan, with

the support of Judge Bunning and the Federal Court, was to force Shehan to plead guilty before any additional legal claims could be raised by the Church to expose the Bank's crimes. The scheme deployed by Truist Financial with the Federal Court and Judge Bunning worked extremely well and served its purpose – for a while.

29. According to a prominent businessman and former Cincinnati Bengal, the meetings and negotiations between Richard Knock and Judge Bunning were rewarded with a seven-figure, quid pro quo, payoff in exchange for utilizing the Federal Court to protect the Bank's equity value. These events, and more, have been concealed by the Bank's President, Kelly S. King, Andrew Hawking and Bob Zapp, Jr., Richard Knock, Deborah J. Durr and many others.
30. Soon after Shehan filed his first Complaints in Kentucky Courts, I.R.S. Special Agent, Susan Palmisano, became the subject of a tumultuous Internal Affairs Investigation, and was subsequently terminated for her handling of the Shehan's tax case and, now more clearly visible, her illicit relationship with Truist Financial Corporation. Officials at the Cincinnati I.R.S. office, after suspending Palmisano from duty, attempted to conceal Palmisano's termination as a typical retirement. That she, "did not find the job challenging." Documents prove otherwise.
31. Louis DeFalaise was replaced by the Department of Justice the same month the Bank announced its acquisition of the target Bank involved in the acquisition.

32. Protecting the target Bank's equity value of \$364,000,000 for acquisition is the motive driving the ex parte and secret meetings and discussions with Federal Judges and other Federal Officials in the U.S. District Court in the Eastern District of Kentucky.
33. Moreover, concealing Shehan's knowledge of the Bank's Conspiracy to target and collapse People's Bank and Shehan's evidence and testimony in the Fen Phen case are additional motives driving the Bank's ex parte and secret meetings with Federal Judges and other Federal Officials in the U.S. District Court in the Eastern District of Kentucky.
34. Prior to the crimes committed against Shehan, his company, Larson Theme Construction was doing over \$30,000,000 in sales per year at the time Shehan purchased the company from DMB in Arizona. At one time, the company employed over 350 people and is most notable in the industry for our work in building Disney's Tree of Life and all theme features throughout Disney's Animal Kingdom. Larson's work in constructing SeaWorld's Discovery Cove, the world's first swim-with-the-dolphins attraction is our second most notable project. Total weekly payroll across all projects and operations was in the range of \$575,000 per month. Our work included seven major attractions for Disney, Universal Studios Islands of Adventure, Universal Studios Dubai, multiple SeaWorld locations, Cedar Fair parks, Six Flags parks, over 45 public aquariums and most all zoos across the United States. However, all of that ended when the I.R.S. Special Agent,

Susan Palmisano, launched a criminal investigation on behalf of Truist Financial Corporation – as necessary to conceal the Bank's racketeering activities.

35. Regardless of any possible arguments Defendants would propose to raise – the only reason Shehan does receive acceptance of his PPP application – is the direct result of civil rights violations and crimes committed by the United States Department of Justice, other Federal Officials and Truist Financial Corporation against Shehan.
36. Truist Financial Corporation failed to disclose in its annual reports the terms and conditions of the agreement reached between the U.S. Department of Justice and Joseph Bamberger to utilize Shehan's tax case to immunize Bamberger from criminal prosecution.
37. Truist Financial Corporation failed to disclose in its annual reports the terms and conditions reached in the agreement with Federal Judge, Susan J. Dlott, to utilize Shehan's tax case to protect her husband from criminal prosecution.
38. Truist Financial Corporation failed to disclose in its annual reports the terms and conditions reached in the agreement to coordinate a political assault, led by the Department of Justice, on the value of People's Bank of Crestview Hills, KY and

deliver People's value to the shareholders in The Bank. See public remarks by Bob Zapp, Jr., memorialized in the media, describing his strategy to create a "run-on-the-bank" against deposits at People's Bank – a plan he conceived months in advance.

39. Truist Financial Corporation failed to disclose in its annual reports the terms and conditions reached in the agreement with the Kentucky Enquirer to coordinate with the Department of Justice and Louis DeFalaise to launch a public relations and media attack on the value of People's Bank as conceived and deployed by the Bank.
40. Truist Financial Corporation failed to disclose in its annual reports the terms and conditions reached with I.R.S. Special Agent, Susan Palmisano, to initiate, manage and utilize Shehan's tax case to suppress his testimony in the People's Bank matter.
41. Truist Financial Corporation failed to disclose in its annual reports the terms and conditions reached with I.R.S. Special Agent, Susan Palmisano, to initiate, manage and utilize Shehan's tax case to suppress his testimony in the Fen Phen matter.
42. Truist Financial Corporation failed to disclose in its annual reports the agreement reached and how the Bank communicated with the Department of Justice and

I.R.S. Agent, Susan Palmisano, to control the timing and content of information she was required to conceal from the Courts.

43. Truist Financial Corporation failed to disclose in its annual reports the agreement reached with Federal Judge, David Bunning, in exchange for the services provided by the Federal Court for protecting the Bank's equity value for acquisition.
44. Truist Financial Corporation failed to disclose in its annual reports the agreement reached with multiple law firms in Northern, Kentucky, to influence the Federal Court and Federal Officials, # 1 through #5, inside and outside the Federal Court in the Eastern District of Kentucky.
45. Truist Financial Corporation failed to disclose in its annual reports the agreement reached with Richard Knock. Knock was first dispatched by the Bank to submit false and misleading information to the F.B.I. to divert the criminal probe away from the Bank. Then Knock surfaced in ex parte meetings and secret negotiations with the Federal Court to force a guilty plea on Shehan and provide assurance to the Bank that Shehan would receive a prison term of exactly "24" months, not 27 months - as the Judge insisted in the public record.



46. According to the witness's audio recorded testimony, there is a seven-figure, quid pro quo involved to secure the services of the Federal Court for the benefit of the Bank. That transaction is material and of sufficient magnitude which requires reporting. However, Truist Financial, Kelly S. King, Andrew Hawking and Bob Zapp, Jr., Deborah J. Durr, and other bankers and shareholders, have not disclosed the terms and conditions of this agreement in its annual reports.
47. Truist Financial Corporation failed to disclose in its annual reports the \$20,000,000 in bank fraud committed against the Florence Baptist Church by Bob Zapp, Jr., Andrew Hawking, Ziegler & Schneider, Adams, Stepner, Wolterman, Dusing and concealed by Bank President, Kelly S. King. The \$20,000,000 in bank fraud and necessity to protect the Bank's equity value is the motive driving the ex parte meetings and secret discussions with the Federal Court and other Federal Officials.
48. Truist Financial Corporation failed to disclose in its annual reports the list of victims who suffered because of over two decades of public corruption, graft, racketeering and fraud led by the Bank's officers, directors and shareholders, including Kelly S. King, Andrew Hawking, Bob Zapp, Jr., and Mrs. Deborah J. Durr, and other shareholders and public officials.

49. However, the events and details described above are not the subject of this action. This action is focused exclusively on damages resulting from the Plaintiff being denied benefits made available through the Paycheck Protection Program.
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50. Stock Yard Bank's decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where Stock Yard Bank was delighted to receive value offered by Shehan but, failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

51. Paypal's decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where Paypal failed to fully investigate the information and basis for denying

Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

52. PNC Bank's decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where PNC Bank failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

53. The PPP is a form of insurance where the policy benefit is compensation for economic losses caused by the pandemic. The Small Business Administration was already in the business of provided Economic Disaster Loans prior to this pandemic. The PPP is a unique program for a specific purpose. The funds do not have to be repaid negating the perspective the transaction is a loan. The banks are receiving a commission for managing and processing the insurance policy. To deny Shehan the benefit of this insurance, under the economic circumstances and in conjunction with events described in this Complaint, is a clear act in Bad Faith.

54. Moreover, many of the Defendants connected to Truist Financial Corporation are receiving benefits from the P.P.P. – while Shehan, the victim as described herein – is barred from benefiting in the P.P.P. This translates to additional injuries to Shehan – during an economic crisis! A clear confirmation of outrageous conduct.
55. Shehan reserves the right to modify this Complaint, to add Defendants and raise additional Claims as indicated through the process of Discovery as provided by law.
56. As a result, William C. Shehan, Jr., files this Complaint with the UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO, requesting relief. The purpose of this Complaint is to seek relief and obtain equal protection under the law.

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**Date: June 29<sup>th</sup>, 2020**

## First Claim for Relief

### **Breach of Contract**

**Stock Yard Bank's** decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where Stock Yard Bank was delighted to receive value offered by Shehan but, failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

**Paypal's** decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where Paypal failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

**PNC Bank's** decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where PNC Bank failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

The PPP is a form of insurance where the policy benefit is compensation for economic losses caused by the pandemic. The Small Business Administration was already in the business of provided Economic Disaster Loans prior to this pandemic. The PPP is a unique program for a specific purpose. The funds do not have to be repaid negating the perspective the transaction is a loan. The banks are receiving a commission for managing and processing the insurance policy. To deny Shehan the benefit of this insurance, under the economic circumstances and in conjunction with events described in this Complaint, is a breach of the agreement offered by the Trump Administration and Small Business Administration to benefit the people.

## Second Claim for Relief

### **Bad Faith**

**Stock Yard Bank's** decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where Stock Yard Bank was delighted to receive value offered by Shehan but, failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

**Paypal's** decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where Paypal failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

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## Third Claim for Relief

### **Gross Negligence**

**Stock Yard Bank's** decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where Stock Yard Bank was delighted to receive value offered by Shehan but, failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

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**PNC Bank's** decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where PNC Bank failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

**Defendants** failed to exercise reasonable care in the handling and processing of Shehan's PPP application where additional economic harm is inflicted on Shehan because of their clear failures, selfish actions, and violations of law.



## Fourth Claim for Relief

### **Tort of Outrage**

**Stock Yard Bank's** decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where Stock Yard Bank was delighted to receive value offered by Shehan but, failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

**Paypal's** decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where Paypal failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

**PNC Bank's** decision to decline Shehan's application in the PPP is a violation and breach of the Paycheck Protection Program's purpose during a pandemic which constitutes gross disregard in caring for others, is outrageous on its face and proven more so against the backdrop of events described herein. The PPP is a form of insurance benefits provided to relieve suffering during a time of economic loss where PNC Bank failed to fully investigate the information and basis for denying Shehan's benefits under the Paycheck Protection Program – constituting a total disregard for truth and justice and a clear act in Bad Faith.

## **Fifth Claim for Relief**

### **Punitive Damages**

**Plaintiff restates and incorporates by reference, as if fully set forth herein, the allegations in the preceding paragraphs of the Complaint.**

**Defendants have willfully and maliciously engaged in conduct in flagrant disregard of the rights of the Plaintiff and with specific intent to cause injury.**

**Plaintiff is entitled to an award of punitive damages sufficient to punish and deter Defendants for the injurious conduct set forth above, in an amount to be determined at trial.**

\*\*\*\*\*

## **Claim for Total Damages**

**Plaintiff is seeking damages, collectively from all current and future Defendants, in an amount of \$50,000,000.**

**(Fifty Million U.S. Dollars and 00/100)**

**June 29<sup>th</sup>, 2020**

**PRAYER FOR RELIEF**

- A. Trial by Jury.
- B. Judgement for the Plaintiff on all Claims for Relief as provided by law.
- C. Judgement against the Defendants, jointly and severally, for compensatory and consequential damages, including without limitation lost income, out of pocket expenses, and mental anguish, all in amounts to be determined at trial;
- D. The right to amend the Complaint to add additional named parties and factual allegations as revealed in discovery.
- E. Punitive damages in an amount to be determined at trial;
- F. Reasonable cost of suit;
- G. Pre-judgement interest on each unreimbursed claim at a rate of 12%;
- H. Post judgement interest at a rate of 18%; and
- I. Any and all other relief to which Plaintiff may be entitled

**VERIFICATION**

After being dully sworn, I, William C. Shehan, Jr., have personal knowledge concerning the matters set forth in the foregoing Complaint, and do hereby verify, certify, swear and affirm that the information and allegations contained in the foregoing Complaint are true and accurate to the best of my information, knowledge and belief.

Respectfully submitted,

A handwritten signature in blue ink that reads "William C. Shehan, Jr." with a stylized flourish at the end.

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**William C. Shehan, Jr.**

903 Riva Ridge

Union, KY 41091

Bshehan@Larson-usa.com

(859) 653-3802

Pro se Plaintiff

June 29<sup>th</sup>, 2020